

## REMARKS

### ***Summary of the Amendment***

Upon entry of the above amendment, claims 54 and 55 will have been added. Accordingly, claims 2-13, 15-37, and 39-55 will be pending with claims 2, 16, 19, 21, 25, 37, 39, 42, 43, 45, 46, 51 and 54 being independent.

### ***Summary of the Official Action***

In the instant Office Action, the Examiner rejected claims 2-13, 15, and 22-24 over the art of record. Moreover, the Examiner indicated that claims 16-21, 25-37, and 39-53 were allowed. By the present amendment and remarks, Applicants submit that the rejections have been overcome, and respectfully request reconsideration of the outstanding Office Action and allowance of the present application.

### ***Acknowledgment of Allowability***

Applicant gratefully acknowledges the Examiner's indication that claims 16-21, 25-37, 39-53 are allowed.

### ***Traversal of Rejection Under 35 U.S.C. § 102(b)***

#### ***1. Over PERKINS et al.***

Applicants traverse the rejection of claims 2-7, 13, 15, and 22-24 under 35 U.S.C. § 102(b) as being anticipated by PERKINS et al. (U.S. Patent No. 3,077,925) [hereinafter "PERKINS et al."]. The Examiner asserts that PERKINS et al. shows all of the features of the above-noted claims. Applicants traverse the Examiner's assertions.

Applicants respectfully traverse this rejection and the Examiner's assertions and opinions. Notwithstanding the Office Action assertions as to what this document discloses or suggests, Applicants submit that no proper reading of the above-noted document discloses or suggests, inter alia, a plurality of long-chain strength supports composed of a metallic material and arranged to form interstices, and a filler at least partially filling the interstices to make said belt *fluid impermeable*, wherein the belt supports a paper web in the web producing machine, as recited in independent claim 2.

Applicant acknowledges that PERKINS et al. discloses a belt B for a paper press wherein the belt may be formed from rubber casing 30 and may be reinforced with a metal wire 36 (see column 4, lines 40-56). However, it is clear that PERKINS et al. relates to a belt which necessarily includes drainage holes 24 that make the belt fluid permeable. More specifically, PERKINS et al. discusses a belt B having drainage channels 22 and drainage holes 24 in column 3, lines 35-54. Applicants submit that such holes allow fluid to permeate therethrough.

Contrary to PERKINS et al., the present invention includes, inter alia, a filler at least partially filling the interstices to make said belt *fluid impermeable*, as recited in independent claim 2.

Because the applied reference of PERKINS et al. fails to disclose each and every element recited in the claim, the Examiner is respectfully requested to withdraw the rejection under 35 U.S.C. § 102.

### ***Dependent Claims***

Further, Applicants submit that claims 3-7, 13, 15, and 22-24 are allowable at least for the reason that these claims depend from allowable base claim 2 and because these claims recite additional features that further define the present invention. In particular, Applicants submit that PERKINS et al. fails to anticipate, inter alia, the long-chain strength supports comprise a metal having a high thermal conductivity as recited by claim 3; the metal is one of stainless steel and bronze as recited by claim 4; the long-chain strength supports comprise filaments as recited by claim 5; the filaments comprise a metal as recited by claim 6; the long-chain strength supports comprise a substantially circular cross-section as recited by claim 7; the filler comprises a plastic as recited by claim 13; the fluid is a liquid as recited by claim 15; the belt comprises a screen as recited by claim 22; the screen is flexible and formed of woven long-chain strength supports as recited by claim 23; and the belt comprises an interwoven sheet of the long-chain strength supports as recited by claim 24.

### ***Traversal of Rejections Under 35 U.S.C. § 103(a)***

1. Over PERKINS et al. in view of KASTNER and BOWEN

Applicants traverse the rejection of claims 8-12 under 35 U.S.C. § 103(a) as being unpatentable over PERKINS et al. in view of KASTNER (U.S. Patent No. 1,794,624)[hereinafter "KASTNER"] and BOWEN, Jr. (U.S. Patent No. 5,449,548)[hereinafter "BOWEN, Jr."].

KASTNER is directed to a metallic cloth for paper making machines. In particular, KASTNER discusses warp wires a1 and double weft b1 wires as

shown in figure 4. Contrary to the present invention recited in claim 2, KASTNER does not disclose that the metallic cloth is fluid impermeable. Furthermore, as shown in figure 6, the weave of wires a1 and b1 show large areas that would appear to allow a fluid to permeate. In any event, Applicants note that KASTNER fails to teach or suggest that these large areas are fluid impermeable.

BOWEN, Jr. is directed to a reduced permeability papermaker's fabrics containing fibers with fins designed to distort at lower force levels by having a reduced cross sectional area within the fin. In particular, BOWEN, Jr. discloses reduced or specific permeability (see column 2, lines 64 et seq.). Contrary to the present invention, BOWEN, Jr. does not disclose that the fabric is impermeable, but, in fact, discloses that the fabric is permeable.

As noted above, PERKINS et al. includes drainage channels 22 and drainage holes 24 that allow fluid to permeate therethrough.

Thus, there is no disclosure in PERKINS et al., KASTNER or BOWEN of the features of the present claimed invention including, inter alia, at least partially filling the interstices to make said belt *fluid impermeable*, as recited in independent claim 2. Moreover, there is no suggestion or disclosure in PERKINS et al., KASTNER or BOWEN, separately or in any proper combination thereof, that renders obvious the features of the present claimed invention including, inter alia, at least partially filling the interstices to make said belt *fluid impermeable*. Thus, Applicants submit that the combination of PERKINS et al. in view of KASTNER and BOWEN does not render obvious the features of independent claim 2.

Furthermore, Applicant submits that dependent claims 8-12 are allowable at least for the reason that these claims depend from on allowable base claim 2 and because these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper reading of PERKINS et al. in view of KASTNER and BOWEN discloses or suggests, in combination: the long-chain strength supports comprise a substantially rectangular cross-section, as recited in claim 8; the long-chain strength supports comprise a substantially square cross-section, as recited in claim 9; the long-chain strength supports comprise a substantially oval cross-section, as recited in claim 10; the long-chain strength supports comprise a polygonal cross-section, as recited in claim 11; and the long-chain strength supports comprise a variable cross-sectional shape along their lengths, as recited in claim 12.

Furthermore, Applicant submits that there is no motivation or rationale disclosed or suggested in the art to modify any of the applied documents in the manner asserted by the Examiner. Nor does the Examiner's opinion provide a proper basis for these features or for the motivation to modify this document, in the manner suggested by the Examiner. Therefore, Applicant submits that the invention as recited in at least independent claims 8-12 is not rendered obvious by any reasonable inspection of these disclosures.

Accordingly, Applicant requests that the Examiner reconsider and withdraw the above-noted rejection under 35 U.S.C. § 103(a) and indicate that these claims are allowable over the applied art of record.

***New Claims are also Allowable***

Applicant submits that the new claims are also allowable over the applied art of record. Specifically, claims 54 and 55 recite a combination of features which are clearly not disclosed or suggested by the applied art of record. These claims find support in the instant application at, inter alia, page 3, lines 12-13.

Accordingly, Applicant respectfully requests consideration of these claims and further request that the above-noted claims be indicated as being allowable.

***Application is Allowable***

Thus, Applicant respectfully submits that each and every pending claim of the present invention meets the requirements for patentability under 35 U.S.C. §§ 102 and 103, and respectfully request the Examiner to indicate allowance of each and every pending claim of the present invention.

***Authorization to Charge Deposit Account***

If for any reason a check including the amount for any necessary fees is not associated with this file, the Commissioner is authorized to charge to Deposit Account No. 19 - 0089 the amounts identified herein for the missing check, as well as any necessary fees not explicitly identified, including any extensions of time fees required to place the application in condition for allowance by Examiner's Amendment, in order to maintain pendency of this application.

**CONCLUSION**

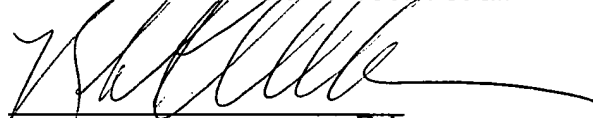
In view of the foregoing, it is submitted that none of the references of record, either taken alone or in any proper combination thereof, anticipate or render obvious the Applicants' invention, as recited in each of the pending

claims. The applied references of record have been discussed and distinguished, while significant claimed features of the present invention have been pointed out.

Further, any amendments to the claims which have been made in this response and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Accordingly, reconsideration of the outstanding Office Action and allowance of the present application and all the claims therein are respectfully requested and now believed to be appropriate.

Respectfully submitted,  
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